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WESTERN STATES CONTRACTIC, INC.

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 JAY COLLINS,

12 Plaintiff,

13 vs.

14 WESTERN STATES CONTRACTING, INC, a
Nevada corporation; AND DOES 1-50,
15 inclusive,

16 Defendant.

Case No.: 2:20-cv-00302-JAD-NJK

**STIPULATION TO EXTEND TIME FOR
DEFENDANT TO RESPOND TO
PLAINTIFF'S COMPLAINT**

17
18 IT IS HEREBY STIPULATED by and between Plaintiff JAY COLLINS ("Plaintiff"),
19 through his counsel, Watkins & Letofsky, LLP, Defendant, WESTERN STATES
20 CONTRACTING, ("Defendant" or "Western"), by and through its counsel, Jackson Lewis P.C.,
21 that Defendants shall have a 30-day extension up to and including April 28, 2020, in which to file
22 their respective responses to Plaintiff's Complaint. This Stipulation is submitted and based upon
23 the following:

24 1. Plaintiff filed his Complaint on February 12, 2020. ECF No. 1. Defendants were
25 served with the Complaint on March 9, 2020.

26 2. Defendants' responses to the Complaint are currently due on March 30, 2020.

27 3. Due to the press of other matters, including adjustments made necessary by the
28 COVID-19 pandemic, and in order to respond to the pleading, counsel for Defendants require

1 additional time. Counsel for Defendants request a thirty (30) day extension, up to and including
2 April 28, 2020, to file their respective responses to Plaintiff's Complaint.

3 4. This is the first request for an extension of time for Defendants to file a response to
4 Plaintiff's Complaint.

5 5. This request is made in good faith and not for the purpose of delay.

6 6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
7 as waiving any claim and/or defense held by any party.

8 Dated this 30th day of March, 2020.

9 WATKINS & LETOFSKY, LLP

JACKSON LEWIS P.C.

11 /s/ Theresa M. Santos

/s/ Lisa A. McClane

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16 Attorney for Plaintiff
17 JAY COLLINS

18 **ORDER**

19 **IT IS SO ORDERED.**

21 
22 United States Magistrate Judge

23 Dated: March 31, 2020